

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Petition of NeuStar, Inc., as the North American Numbering Plan Administrator and on behalf of the Massachusetts telecommunications industry, for area code relief for the 413 area codes in Western Massachusetts.

D. T. E. 00-64

PETITION BY AT&T COMMUNICATIONS OF NEW ENGLAND, INC.,  
FOR LEAVE TO INTERVENE

AT&T Communications of New England, Inc., - on behalf of itself and its affiliated companies that provide telephony or telecommunications services in Massachusetts, including companies doing business within Massachusetts as AT&T Broadband and AT&T Wireless Services (collectively "AT&T") - hereby petitions, pursuant to 220 C.M.R. § 1.03, for leave to intervene as a party in this docket. AT&T has a business address of 99 Bedford Street, Boston, Massachusetts 02111. As grounds for this petition, AT&T states as follows:

AT&T is a common carrier of telecommunications services authorized by the Department to provide interLATA and intraLATA services in Massachusetts. AT&T provides both wireless and wireline services to customers in Massachusetts, including wireline services via cable telephony. AT&T Wireless Services provides wireless personal communications services ("PCS") in markets nationwide, including within Massachusetts. AT&T Local Services provides wireline services to local customers nationwide, including within Massachusetts. AT&T Broadband provides telephony and data services to local customers nationwide, including within Massachusetts. AT&T is in the process of entering the market to provide local exchange services in Massachusetts, is continuing to upgrade its cable television network to permit the offering and support of telephony services, and is continuing to build out its PCS network in Massachusetts. AT&T anticipates that it will continue to expand the range of services within the western Massachusetts LATA, which is currently served by the 413 area code.

In order to compete for new customers, AT&T needs to be able to assign telephone numbers to those customers (except, in the case of some wireline and broadband or cable telephony customers, to the extent that Verizon-MA is able successfully and in a timely and coordinated manner to port existing numbers to customers who switch to AT&T). Under the current system of allocating telephone numbers, AT&T expects that in the future it may have to obtain additional new exchange (or NXX) codes in order to serve new customers. Any area code relief plan or related orders adopted by the Department in this docket will directly affect AT&T's ability to provide service to customers and to compete for new customers.

AT&T is participating as a party in Dockets 98-38 and 99-99, regarding NXX codes conservation issues. In addition, AT&T participated as a party in Dockets 96-61 and

Untitled

99-11, the previous area code relief dockets, and in Docket 97-90, regarding extension of a previously established permissive dialing period in the eastern Massachusetts LATA.

For the foregoing reasons, and for the same reasons that it was granted leave to intervene in Dockets 98-38, 96-61, 97-90, 99-11, and 99-99, AT&T will be substantially and specifically affected by the Department's review and decision in this docket.

WHEREFORE, for the foregoing reasons, AT&T requests that it be granted leave to intervene as a party in this proceeding.

Respectfully submitted,

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